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**Admitted Pro Hac Vice
Counsel for Defendants*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

PEGGY COLLINS,

Plaintiff,

v.

C. R. BARD, INCORPORATED and BARD
PERIPHERAL VASCULAR, INCORPORATED,

Defendants.

CASE NO. 2:19-cv-01864-RFB-BNW

**STIPULATION TO EXTEND DISCOVERY AND PRE-TRIAL DEADLINES
(SECOND REQUEST)**

Comes now, Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”) and Plaintiff Peggy Collins (“Plaintiff”), by and through their undersigned counsel of record, pursuant to LR IA 6-2, and hereby stipulate that all existing discovery and

pre-trial deadlines are extended by sixty (60) days. This stipulation is entered into as a result of complications and difficulties related to the current national emergency caused by the spread of COVID-19.

For the foregoing reasons, the parties stipulate and request that this Court modify the Stipulated Discovery Plan and Scheduling Order, Dkt. 30, as follows:

PROPOSED DATE	DEADLINE
November 13, 2020	Close of case-specific fact discovery.
January 26, 2021*	The Parties shall produce case-specific expert reports.
February 26, 2021	The Parties shall produce any case-specific rebuttal expert reports.
March 22, 2021	Deadline to depose Plaintiff's experts about their case-specific reports.
April 20, 2021	Deadline to depose Defendants' experts about their case-specific reports.
June 8, 2021	Deadline to file Daubert motions and other dispositive motions.

* The proposed deadlines are extended sixty (60) days except the deadline for Parties to produce case-specific expert reports which is extended ninety (90) days because the deadline falls during 2020 winter holidays.

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1 **IT IS SO STIPULATED.**

2 Dated this 15th day of June 2020.

3 MARTIN BAUGHMAN, PLLC

GREENBERG TRAURIG, LLP

4 By: /s/ Ben C. Martin

By: /s/ Eric W. Swanis

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18 *Counsel for Plaintiff*

Counsel for Defendants

19 **IT IS SO ORDERED**

20 **DATED: 7:04 pm, June 18, 2020**

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22 BRENDA WEKSLER
23 UNITED STATES MAGISTRATE JUDGE